

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.) Case No. 06- *TOM*
)
TOMAS LUCAS-IGNACIO)
)
Defendant.)

MOTION FOR DETENTION HEARING

NOW COMES the United States and moves for the pretrial detention of the defendant, pursuant to 18 U.S.C. § 3142(e) and (f). In support of the motion, the United States alleges the following:

1. **Eligibility of Case.** This case is eligible for a detention order because case involves (check all that apply):

Crime of violence (18 U.S.C. § 3156)
 Maximum sentence life imprisonment or death
 10+ year drug offense
 Felony, with two prior convictions in above categories
 Serious risk defendant will flee
 Serious risk obstruction of justice



2. **Reason For Detention.** The court should detain defendant because there are no conditions of release which will reasonably assure (**check one or both**):

Defendant's appearance as required
 Safety of any other person and the community

3. **Rebuttable Presumption.** The United States (will / will not) invoke the rebuttable presumption against defendant under § 3142(e). (If yes) The presumption applies because (**check one or both**):

Probable cause to believe defendant committed 10+ year drug offense or firearms offense, 18 U.S.C. § 924(c)
 Previous conviction for "eligible" offense committed while on pretrial bond

4. **Time For Detention Hearing.** The United States requests the court conduct the detention hearing,

At first appearance
 After continuance of 3 days (not more than 3).

5. **Temporary Detention.** The United States request the temporary detention of the defendant for a period of days (not more than 10) so that the appropriate officials can be notified since (**check 1 or 2, and 3**):

1. At the time the offense was committed the defendant was:
 (a) on release pending trial for a felony;

- (b) on release pending imposition or execution of sentence, appeal of sentence or conviction, or completion of sentence for an offense;
- (c) on probation or parole for an offense.

2. The defendant is not a citizen of the U.S. or lawfully admitted for permanent residence.

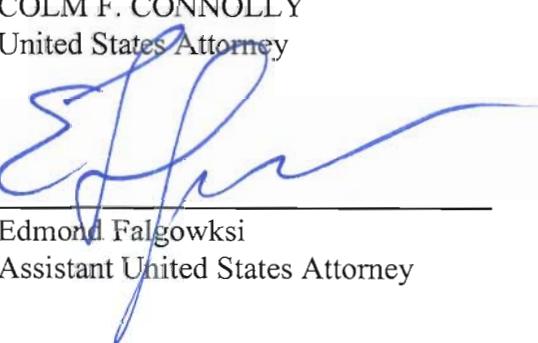
3. The defendant may flee or pose a danger to any other person or the community.

6. **Other Matters.**

DATED this 30th day of May, 2006.

COLM F. CONNOLLY
United States Attorney

BY:


Edmond Falgowski
Assistant United States Attorney